

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

IN RE: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION

Master File No. 07-CV-5944-JST

MDL No. 1917

This Document Relates to:

**STIPULATION AND [PROPOSED] ORDER  
RE: IRICO DEPOSITIONS**

*ALL DIRECT PURCHASER ACTIONS*

Judge: Honorable Jon S. Tigar

*ALL INDIRECT PURCHASER ACTIONS*

1 Direct Purchaser Plaintiffs (“DPPs”), Indirect Purchaser Plaintiffs (“IPPs”) and Defendants  
2 Irico Group Corporation and Irico Display Devices Co., Ltd. (“Irico” or the “Irico Defendants,”  
3 collectively the “Parties”), by and through the undersigned counsel and pursuant to Federal Rule of  
4 Civil Procedure 16(b)(4) and Civil Local Rule 7-12, hereby stipulate as follows:

5 WHEREAS, on August 11, 2022, the Court ordered that Irico witnesses must appear for  
6 deposition by September 9, 2022 (“September 9 Deadline”) [ECF No. 6047];

7 WHEREAS, following the Court’s order, Irico witnesses Wang Zhaojie and Yan Yunlong  
8 (the “Witnesses”) agreed to travel to Macau for depositions;

9 WHEREAS, Irico represents that the current visas of Wang Zhaojie and Yan Yunlong for  
10 travel to Macau require that both witnesses return to mainland China no later than August 30,  
11 2022;

12 WHEREAS, Irico represents that there was not sufficient time for Irico to apply for and  
13 receive new visas for the Witnesses to travel to Macau in time to ensure that the depositions could  
14 go forward after August 30, 2022, but prior to the September 9 Deadline;

15 WHEREAS, in order to comply Court’s order of August 11, 2022, and in light of the  
16 expiration of the current visas, on August 19, Irico informed DPPs and IPPs that it was prepared to  
17 proceed with the depositions of the Witnesses between August 23 and August 30, 2022; and,

18 WHEREAS, the Parties agree that conducting the depositions on the schedule proposed by  
19 Irico would create significant difficulty for all Parties, and that a short extension of the deposition  
20 deadline to allow time for the Witnesses to obtain new visas would benefit all Parties and allow for  
21 the orderly conduct of the depositions;

22 IT IS HEREBY STIPULATED AND AGREED by and between counsel for DPPs, IPPs,  
23 and the Irico Defendants that good cause exists to modify the deadline for the Witnesses to appear  
24 as follows:

25 1. The September 9, 2022, deadline for Irico witnesses to appear for deposition is  
26 hereby VACATED;

27 2. Irico will arrange for the Witnesses to apply for visas by August 26, 2022, to  
28 facilitate depositions for both witnesses in the time frames indicated below;

1           3. Irico will provide Plaintiffs with copies of the visa renewal applications, and any  
2 related non-intra-governmental communications with the Macau visa authority, and will keep  
3 Plaintiffs informed regarding the status of the applications;

4           4. Provided that his new visa is received by September 15, 2022, the deposition of  
5 Wang Zhaojie shall be conducted remotely from Macau during the week of September 19, 2022;

6           5. Provided that his new visa is received by September 15, 2022, the deposition of Yan  
7 Yunlong shall be conducted remotely from Macau during the week of September 26, 2022;

8           6. If the Witnesses do not receive their new visas by September 15, 2022, or if the  
9 Witnesses are involuntarily quarantined on their travel to Macau for the depositions such that they  
10 are not able appear on the scheduled dates, the Parties may file a new Stipulation and [Proposed]  
11 Order to allow for a limited amount of additional time for the deposition(s) to proceed once the  
12 visas are obtained or quarantine conditions permit the deposition(s) to proceed;

13           7. This Stipulation and Order does not modify any other dates or terms of this Court's  
14 August 11, 2022 Order except as stated above.

15           **PURSUANT TO STIPULATION AND GOOD CAUSE APPEARING, IT IS SO  
16 ORDERED.**

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18 Dated: August 22, 2022

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HONORABLE JON S. TIGAR  
UNITED STATES DISTRICT JUDGE

1 Dated: August 22, 2022  
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3 /s/ R. Alexander Saveri

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14 *Plaintiffs*

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*and Irico Display Devices Co., Ltd.*

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